

June 14, 2018

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street, SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: UM 1802—PacifiCorp’s Comments on the Staff Report and Comments from the Renewable Energy Coalition

PacifiCorp d/b/a Pacific Power submits these comments to clarify the nature of the housekeeping changes provided in PacifiCorp’s May 18, 2018 compliance filing. PacifiCorp’s housekeeping edits do not result in any substantive changes and the revised language does not require the completion of an interconnection study before PacifiCorp will provide indicative pricing. PacifiCorp’s compliance filing is consistent with the requirements of Order No. 18-131 and should be approved by the Public Utility Commission of Oregon (Commission).

On June 11, 2018 the Renewable Energy Coalition (REC) filed comments claiming that “PacifiCorp has added language that requires QFs to provide copies of interconnection studies and agreements to receive indicative pricing[.]”¹ Commission Staff filed a Staff Report claiming that PacifiCorp added a new requirement for QFs to provide interconnection studies before receiving indicative pricing.²

The revised language in the compliance filing specifies that the owner of a proposed QF project must provide “the status of interconnection arrangements, including copies of any completed interconnection studies or agreements”.³ While the owner must provide the status of interconnection arrangements, the second clause of this phrase regarding interconnection studies is permissive, not mandatory. It is meant to ensure that *if* the owner of the proposed QF project *has* interconnection studies, they should be provided to PacifiCorp. However, if those studies have not been completed, then the owner must provide the current status of those interconnection arrangements.

No substantive change in the process is contemplated in PacifiCorp’s compliance filing and no party has raised issues with any other aspects of the compliance filing. PacifiCorp respectfully requests the Commission approve its compliance filing.

¹ Renewable Energy Coalition Comments on PacifiCorp Compliance Filing at 5 (June 11, 2018).

² Staff Report at 2–3 (June 11, 2018).

³ PacifiCorp’s UM-1802 Compliance Filing (May 18, 2018).

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If you have questions about this filing, please contact Natasha Siores, Manager, Regulatory Affairs, at (503) 813-6583.

Sincerely,



Etta Lockey
Vice President, Regulation